

Decision **PROPOSED DECISION OF ALJ KENNEY** (Mailed 3/4/15)**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking to Revise and Clarify Commission Regulations Relating to the Safety of Electric Utility and Communications Infrastructure Provider Facilities.

Rulemaking 08-11-005
(Filed November 6, 2008)

**DECISION GRANTING COMPENSATION TO HANS LAETZ
FOR SUBSTANTIAL CONTRIBUTION TO D. 14-02-015**

Intervenor: Hans Laetz, J.D.	For contribution to Decision (D.) 14-02-015
Claimed: \$80,099,25	Awarded: \$40,618.58 (reduced 49.3%)
Assigned Commissioner: Florio	Assigned ALJ: Kenney

PART I: PROCEDURAL ISSUES

A. Brief description of Decision:	This decision revises General Order (GO) 95 to incorporate new and modified rules to reduce the fire hazards associated with overhead power lines and aerial communication facilities in close proximity to power lines. This decision also approves a consensus plan for investor-owned electric utilities (IOUs) to report fire incidents to the Commission's Safety and Enforcement Division (SED), and for SED to use this data to identify systemic fire-safety risks and develop measures to mitigate the fire-safety risks.
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B. Intervenor must satisfy intervenor compensation requirements set forth in Pub. Util. Code §§ 1801-1812:

	Intervenor	CPUC Verified
Timely filing of notice of intent to claim compensation (NOI) (§ 1804(a)):		
1. Date of Prehearing Conference (PHC):	Apr. 23, 2012	April 17, 2013
2. Other specified date for NOI:		
3. Date NOI filed:	May 14, 2012	May 14, 2013

4. Was the NOI timely filed?		Yes
Showing of customer or customer-related status (§ 1802(b)):		
5. Based on ALJ ruling issued in proceeding number:	R.08-11-005	Verified
6. Date of ALJ ruling:	June 12, 2012	June 12, 2013
7. Based on another CPUC determination (specify):	N/A	
8. Has the Intervenor demonstrated customer or customer-related status?		Yes

Showing of “significant financial hardship” (§ 1802(g)):		
9. Based on ALJ ruling issued in proceeding number:	R.08-11-005	Verified
10. Date of ALJ ruling:	June 12, 2012	June 12, 2013
11. Based on another CPUC determination (specify):	N/A	
12. Has the Intervenor demonstrated significant financial hardship?		Yes
Timely request for compensation (§ 1804(c)):		
13. Identify Final Decision:	D.14-02-005	D. 14-02-015
14. Date of issuance of Final Order or Decision:	May 20, 2014	February 10, 2014
15. File date of compensation request:	July 18, 2014	March 19, 2014
16. Was the request for compensation timely?		Yes

PART II: SUBSTANTIAL CONTRIBUTION**A. Did the Intervenor substantially contribute to the final decision (see § 1802(i), § 1803(a), and D.98-04-059).**

Intervenor’s Claimed Contribution(s)	Specific References to Intervenor’s Claimed Contribution(s)	CPUC Discussion
In 2009, I filed for and was granted intervenor status in I. 09-01-018, the OII into the Malibu Canyon Fire. I elected not to file for intervenor’s compensation there, because I believe my contributions there, while important and productive, do not rise to the high level set by the Public Utilities Code for work that is eligible for compensation. In his 2009 comments from the bench while granting me Motion for Party Status in I.09-01-018, Comm.	<p>“Mr. Laetz shall have party status in this investigation. However, I reiterate what was stated at the PHC: ... I encourage Mr. Laetz to review what is currently transpiring in Rulemaking 08-11-005 and determine whether all or any of his concerns might be raised or addressed therein.”</p> <p>- Commission Timothy Simon, page 4, “Assigned Commissioner’s Ruling and Scoping Memo,” filed Oct. 22, 2009..”</p>	Not relevant, is not a contribution to the decision.

<p>Simon urged me to take my stated “matters of vital concern to the residents of Malibu in particular, and its entire service area in general” and participate at a superior vector for change: R.08-11-005. In his written finding,</p>		
<p>I entered this Proceeding not with specific initiatives, but with a general initiative of demanding stronger rules to protect my community. It became very apparent that the utilities and communications firms were intent on using this Proceeding to refashion Title IV of GO 95 to suit their own interests. To the 40 or so utility engineers and lawyers on the Technical Panel, “modernizing” meant gutting Rule 48, ignoring common sense and practical tightening of regulations in places, and undercutting the Commission’s clear directions in the Scoping Order. Only through attending every Technical Panel meeting was I able to speak up and steer the Panel in the direction it went. Only some of these impacts were specifically measured in the Decision. I frequently found myself arguing as the “voice of the public” in what became successful efforts to beat back moves to deregulate safety rules. My name is mentioned in the Decision 77 times in general, and specifically in the following matters:</p>	<p>Mr. Laetz’s specific participation is mentioned in D.14-012-005 at pages 4, 5, 13, 15, 16, 34, 44, 45, 46, 47, 48, 49, 50, 51, 53, 54, 55, 56, 58, 59, 60, 67 68, 69, 70, 80, 84, 86, 89, 96, 97, 133, 134 and 135.</p>	<p>Not Relevant</p>
<p><u>1) Retention of Loading Calculations, Rule 44.2.</u></p> <p>On the first page of the Decision, the Commission summarizes the Decision’s “most significant revisions ... to reduce the fire hazards associated with overhead power lines and aerial communication facilities in close proximity to power lines.” One</p>	<p>In the Decision, the Commission said:</p> <p>“Laetz’s proposal will provide information that is relevant to investigations of pole failures, which should improve public safety over time. Therefore, we will adopt the proposal ...” (See D.14-02-005 at page 46.)</p> <p>It was incredulous to me that IOUs and CIPs, already required to keep records on</p>	<p>Yes</p>

<p>of those five most-significant items is that “records of loading calculations must be retained for the service life of the pole for which the calculations are performed. This is Contested Proposal 3B, authored by me and supported by not one other single party.</p> <p>(See D.14-02-05, pages 2 and 46.)</p>	<p>wooden pole installations for the life of the structure, would fight requirements to keep loading calculations for new equipment for more than 10 years. Even more baffling was the stand of SED, which was not in any way in support of my proposal.</p>	
<p><u>(2) Field inspection of poles before reconstruction, Rule 44.2.</u></p> <p>In Contested Proposal 3B, I also asked the Commission to order that entities seeking to add or change equipment on wooden structures certify that loading calculations be based on the existing condition of the structure “as reasonably verified by field observations.” The Commission agreed, but said other changes in Rule 44.2 being made now via SED’s Contested Proposal 3A made my proposal redundant.</p>	<p>“We agree with Laetz that loading calculations must accurately reflect the condition of the poles. The failure to do so could result in overloaded poles which, in turn, increases the risk that poles will fail. The failure of an overloaded pole poses a major threat to public safety, as it could damage nearby property, injure and kill people, and ignite a catastrophic wildfire in a worst case scenario. The record of this proceeding indicates that loading calculations using erroneous data are not rare... Although we agree with the intent of Laetz’s proposal, we believe the proposal is unnecessary in light of the revisions to Rule 44.2 that were adopted previously in this decision as part of SED’s Contested Proposal 3A.” - D.14-02-005 at pp. 47-48.</p>	<p>No substantial contribution. The Commission’s Safety and Enforcement Division (SED) proposal was adopted. Laetz’s proposal, which would have been unduly burdensome, was rejected.</p>
<p><u>(3) Warped Poles, Rule 46.</u></p> <p>During the hundreds of hours of uncompensated effort I undertook on I. 09-01-018, it became apparent that leaning or warped poles were a major factor in catastrophic failures on wooden structures. Lengthy discussion on this matter in Technical Panel sessions led me to propose quantifying leaning or warping effects on wooden structures, which evolved into my Rule 44.1 proposals made in Contested Proposal 4. My request that the utilities and CIPs quantify the “P <i>delta</i>” forces on wooden structures, and compose</p>	<p>“We agree with the underlying principle of Laetz’s proposal that the calculation of safety factors should incorporate unplanned lean. The failure to do so could result in overstated safety factors and, ultimately, overloaded poles... We place all electric utilities and CIPs on notice that the failure to incorporate unplanned lean in the calculation of safety factors, such that the minimum required safety factors are not obtained, may be a violation of GO 95 and Pub. Util. Code § 451, depending on circumstances.”</p> <p>(See D.14-02005, at pp. 55-56.)</p>	<p>Yes in part. Although the Commission recognized Laetz’s concerns regarding unplanned lean, it ultimately declined to</p>

<p>regulations to reflect modern materials and practices, was met by stony silence by the engineers and lawyers on the panel. Thus, the Commission was presented with a Proposed Rule Change that admittedly did not represent current engineering principles as represented by numeric representations, as was disclosed to the Commission by me. Even so, the Commission adopted the essence of my Proposal.</p>		<p>adopt Laetz's formulaic proposal.</p>
<p><u>(4) The CIPs' proposed Rule 12.1-E and 44.5.</u></p> <p>The Commission was asked by the CIPs here to allow them to escape with a lesser responsibility when adding communications facilities to existing wooden structures, as imposed on them by D. 12-01-032's Rule 23 changes. In the extensive discussions about this in the Technical Panel discussions, I posed constructive objections that were echoed by the utilities, and posed written comments (see D-14-02-005, page 30).</p>	<p>Ultimately, the Commission agreed with the argument posed by the utilities and me, that the CIPs' proposal would lower safety factors, make newly reclassified Grade A poles more susceptible to failure, and increase the potential fire hazard associated with Grade A poles. (See D-14-02-005, pp. 31-37.)</p>	<p>Yes, but duplication of utilities' position.</p>
<p><u>(5) The "Will Not Fail" Standard, Rule 48.</u></p> <p>The Commission was heavily-lobbied, up to the final moment, by utilities and communications companies seeking release from the important provisions of Rule 48. I spent days and days arguing in the Technical Panel meetings that this was both <i>res judicata</i> and out of scope.</p> <p>I repeatedly argued, orally and in written comments, that the "will not fail" provision in Rule 48 serves a vital role in protecting the public from fire hazards. It was critical that someone speak</p>	<p>It was heartening to see the Commission agree with its own findings in 2012, and argued again by me. In opposing Contested Proposals 5A and 5B, I joined the LA County Fire Dept., MGRA, and SED. I do not claim to have solely influenced the Commission's Rule 48 decision. Rather, we together shows the Commission that its 2012 was correct. (See D.14-02-005 at pp. 58-70.)</p>	<p>Yes, but duplication of LA County Fire Dept., Mussey Grade Road Alliance, and CPUC SED positions.</p>

for the dire need of fire area resident to maintain critical protections of Rule 48.		
<p>(6) Consensus proposals.</p> <p>As the Decision notes, there was extensive discussion on Title IV engineering matters, and I am not an engineer, and thus did not vote on those matters. However, I participated extensively in the discussion regarding these changes. Assuming the voice of the vox populi, I was valuable in being able to steer the Technical Panel away from facially-ridiculous or extreme positions voiced by some engineers, as they floated ideas. The concept of eliminating regulations on poles shorter than 60 feet was floated by one engineer, using the rationale that “studies show that poles below 60 feet only fail when hit by flying debris, which cannot be regulated against.” On a daily basis, I contributed as an informed member of the public to the language of Proposed Rule Changes that ultimately gained consensus support and adoption by the Commission.</p>	(See D.14-02-005, pp. 14-15.)	Yes, but duplication occurred with multiple other parties.

B. Duplication of Effort (§ 1801.3(f) and § 1802.5):

	Claimant	CPUC Verified
a. Was the Office of Ratepayer Advocates (ORA) a party to the proceeding?¹	Not to my knowledge.	Verified
b. Were there other parties to the proceeding with positions similar to yours?	No	Various parties had similar positions
c. If so, provide name of other parties:		Los Angeles

¹ The Division of Ratepayer Advocates was renamed the Office of Ratepayer Advocates effective September 26, 2013, pursuant to Senate Bill No. 96 (Budget Act of 2013: public resources), which was approved by the Governor on September 26, 2013.

	County Fire Dept., Mussey Grade Road Alliance, CPUC SED.
d. Intervenor's claim of non-duplication:	<i>See</i> Intervenor's Comment below. Verified, but duplication still occurred.

C. Additional Comments on Part II:

#	Intervenor's Comment
1	<p>I entered this matter at the recommendation of Commissioner Simon, and with the intention of ascertaining the current state of wooden pole regulations. I discovered that the Commission had left it to the industry, and a small cadre of SED engineers, to rewrite Title IV GO95.</p> <p>To my surprise, there was no public advocacy group or individual participating in the rewrite. To my further surprise, I discovered that the California Legislature had left it up to volunteers like me to step up and perform this vital function, unlike other states like Arizona, which has a state-funded Residential Utilities Consumers Office. The Division of Ratepayer Advocates was nowhere to be seen on this important case. UCANN and TURN were not at the table until the very end, when only TURN filed a comment based on its zero participation in the proceedings.</p> <p>I discovered that SED, although highly competent and diligent, was often disturbingly preoccupied about costs, enforcement practicality and maintaining good working relations with the companies it oversees. While such concerns are important and well-founded, I discovered examples where SED was not fighting for the strongest-possible protections for me and my neighbors. For example, SED argued against my proposal on Rule 44.2 regarding the retention of loading calculations, Rule 44.2, a position that the Commission disagreed with, and which illustrates that SED's concerns about the bureaucratic logistics of enforcement outweighed the agency's clear perceptions about the public good. I soon discovered that this would become a complicated, lengthy expenditure of time and money by me, which could only be acted on by digesting thousands of pages of proposals, memos and studies, and participating in the Technical Panel discussions. It became important for me to enter the Technical Panel proceedings to fight as the sole voice for the important vested interests of residential utility customers in fire-prone areas.</p> <p>There was (and is) no guarantee my significant expenses would be reimbursed.</p> <p>My participation was efficiently and competently performed. Although I was outvoted repeatedly by the utilities on the Technical Panel, I frequently offered editorial or typographical corrections to their highly technical and complicated revisions to GO95, which were welcomed by the experts. I was used as official minutes-taker and my notes were accurate and above reproach. On many issues, I was able to sway the Technical Panel away from extreme positions by offering a "wait a minute, that's just not fair" argument. Efforts to eliminate regulations on poles under 60 feet in height, for example, seemed to make a lot of sense until I alone raised my voice to say "you have got to be kidding." My unique voice on the Technical Panel helped steer the Panel away from proposals from the industries that they</p>

<p>admitted, in hindsight, were not thought-out or likely to be approved by the Commission. As we voted on Proposed Rules Changes, I was on the losing end of numerous 43-1 votes on matters where my argument ultimately swayed the Commission.</p> <p>These “losing” arguments that ultimately were adopted in D.12-01-032 included the crooked pole prohibition, the records retention for life of equipment rule, and the retention of the “will not fail” language of GO95 Rule 48.</p> <p>I made it clear to my Technical Panel cohorts that I would not comment or vote on technical or engineering matters that I did not understand, and I abstained on numerous Title IV rule changes that were highly-technical in content. But on those same issues, I forced an explanation and examination of many technical standards from an educated layman’s perspective, and helped clarify technical standards from an educated layman’s perspective, and deserve compensation for the steep learning curve I surmounted in this proceeding. I will not file for the dozens of hours I spent trying to master the Commission’s Docket system, a labyrinthine procedure that I faced without the support staff that my fellow Technical Panel members enjoy.</p> <p>My participation was effective. The Commission adopted, in whole or part, major factual or legal contentions, and recommendations presented by me.</p>

PART III: REASONABLENESS OF REQUESTED COMPENSATION

A. General Claim of Reasonableness (§ 1801 and § 1806):

<p>a. Intervenor’s claim of cost reasonableness:</p> <p>My participation was productive. Of course, this is a policy matter and the Commission has noted it is difficult to identify a monetary benefit to ratepayers on a policy decision. But in the abstract, it is very easy to hypothesize a monetary value here. The Malibu Canyon fire alone cost \$500 million in damage claims that went to litigation and the responsible pole owners spent \$5 million to reimburse FEMA for firefighting costs. They also paid \$66.5 million in fines and settlements, plus untold millions in legal costs and other expenditures. That fire was caused by an overloaded, crooked pole that these regulations would have prevented. Other fires in California, in that terrible autumn of 2007 alone compound those losses.</p> <p>My claimed compensation is a pittance compared to the costs of fires caused by antiquated GO95 provisions, which were recognized by the Commission when it started this Proceeding. D.13-01-032 discusses at length the contributions by me — many of which were supported by the Commission, some of which were dismissed by the Commission. This work is exactly what is envisioned where Section 1801.3 of the Public Utilities Code states “the provisions of this article shall be administered in a manner that encourages the effective and efficient participation of all groups that have a stake in the public utility regulation process.” The Commission’s D.98-04-059 states “broad based participation is a key ingredient to high quality decision making,” and this private citizen’s participation could not extend through five years of rulemaking procedures without significant financial hardship upon him and his family.</p>	<p>CPUC Verified</p> <hr/> <p>Although Mr. Laetz’s participation in this matter was welcome, it is much too speculative to point to the damages caused by the Malibu Canyon Fire as a potential value for his participation in this proceeding. Also, the correct decision number is Decision (D.) 14-02-015, not D.13-01-032.</p>
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<p>b. Reasonableness of hours claimed:</p> <p>I work weekends as a news editor in Los Angeles. Weekdays, I work as a freelance Environmental Impact Report analyst, and my rate charged to clients is \$160 per hour. As explained below, I keep careful records for myriad reasons. I did not hire any attorneys or experts. The CPUC has never adopted an hourly rate for me. I note in Commission Resolution ALJ-287 that the ranges for “experts” with 0-6 years of experience before the CPUC was set at \$130-\$190 in 2012 and \$135-\$195. in 2013.</p> <p>Having worked on I.08-01-018 since 2009, I now have four-plus years of experience before the CPUC. I request a rate of \$165 per hour be set for me, which is the median fee for experts in 2013. Reviewing the CPUC compensation tables, I note that many non-attorney experts are paid around that rate. I call the following to your attention in support of that rate:</p> <p>I am a law school graduate — not a member of the Bar — who went toe to toe against high-paid attorneys and engineers in this matter.</p> <ul style="list-style-type: none"> - The market rate for a paralegal doing such specialized work is greater than the \$165 I seek. - Due to my expertise, I was able to accomplish this without hiring an attorney or outside expert. - I have four years of experience before the CPUC, but 35 years of experience as an investigator and writer. - I have a Juris Doctor in law, an M.A. in Communications, and a B.A. in Journalism. - I retired after 30 years in news management in Los Angeles television making \$145,000 per annum, and that was before I earned the law degree. - The actual work performed merits the requested hourly rate because there is no other person in California has the ability to discern the issues, legal background to prepare my argument, and ability to work for the public good on this complicated matter in a productive and efficient manner. <p>1) I attach my curae vita (Exhibit A).</p>	<p>Laetz is not an expert on this matter. Although the number of hours claimed was not excessive, the Commission reduced Laetz’s claimed hours for other reasons.</p>
<p>c. Allocation of hours by issue:</p> <p>It is impossible to allocate the time and energy invested in this project by specific subject. It is all related to the general charge from the Commission in D.12-01-03: to consider, develop, and adopt regulations regarding the revision of Section IV of GO 95 to reflect modern materials and practices, with the goal of improving fire safety, to map High Fire Risk Areas, and to draw up a plan for SED to collect fire data.</p>	<p>Without an itemization of time spent on issues, any reductions will be made on a percentage basis of the overall hours. In the future, Laetz should itemize his hours based on issues raised in his substantial contribution section.</p>

B. Specific Claim:*

CLAIMED						CPUC AWARD		
ATTORNEY, EXPERT, AND ADVOCATE FEES								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
Hans Laetz	2012	166.775	\$165	D.13-10-008; ALJ-287	\$2,7517.88	99	\$130.00 ^[B]	\$12,870.00
Hans Laetz	2013	211.85	\$165	D.13-10-008; ALJ-287	\$34,955.25	144.2	\$135.00 ²	\$19,467.00
Hans Laetz	2014	8	\$165		\$1,320.00	8	\$140.00 ³	\$1,120.00
Subtotal: \$67,793.13						Subtotal: \$33,457.00		
OTHER FEES**								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate	Total \$
Travel Hours	2012	28	\$82.50	See Part III, Section A, subpart c, above.	\$2,310.00	26 ^[C]	\$65.00	\$1,690.00
Travel Hours	2013	30	\$82.50	See Part III, Section A, subpart c, above.	\$2,475.00	30	\$67.50	\$2,025.00
Subtotal: \$4,785.00						Subtotal: \$3,715.00		
COSTS								
#	Item	Detail			Amount		Amount	
1	2012 Mileage	2,470 miles to travel from Malibu to Tech Panel meetings in San Diego, Los Angeles and San Francisco, at IRS 2012 reimbursement rate of \$0.555 per mile. (Itemized on Exhibit C.)			\$1,370.85		\$0.00 ^[D]	
2	2012 Expenses	Itemized below and on Exhibit C			\$437.12		\$437.12	
3	2013 Expenses	Itemized below and on Exhibit C			\$1,259.46		\$1,259.46	
4	2013 Mileage	2,626 miles to travel from Malibu to Tech			\$1,483.69		\$0.00 ^[D]	

² Application of 2.0% Cost-of-Living Adjustment as approved by Res. ALJ-287 to Laetz's 2012 rate of \$130.00

³ Application of 2.58% Cost-of-Living Adjustment as approved by Res. ALJ-303 to Laetz's 2013 rate of \$135.00

		Panel meetings in San Diego, Los Angeles and San Francisco, at IRS 2014 reimbursement rate of \$0.565 per mile. (Itemized on Exhibit C.)						
Subtotal: \$4,551.12							Subtotal: \$1,696.58	
INTERVENOR COMPENSATION CLAIM PREPARATION **								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
Hans Laetz	2014	36	82.5	1/2 normal rate	\$2,970.00	25 ^[E]	\$70.00	\$1,750.00
Subtotal: \$2,970.00						Subtotal: \$1,750.00		
TOTAL REQUEST: \$80,099.25						TOTAL AWARD: \$40,618.58		
<p>*We remind all intervenors that Commission staff may audit their records related to the award and that intervenors must make and retain adequate accounting and other documentation to support all claims for intervenor compensation. Intervenor’s records should identify specific issues for which it seeks compensation, the actual time spent by each employee or consultant, the applicable hourly rates, fees paid to consultants and any other costs for which compensation was claimed. The records pertaining to an award of compensation shall be retained for at least three years from the date of the final decision making the award.</p> <p>**Travel and Reasonable Claim preparation time typically compensated at ½ of preparer’s normal hourly rate</p>								

C. CPUC Disallowances and Adjustments:

#	Reason
A	As discussed above, on most issues Laetz either did not make a substantial contribution or his participation was duplicative of the work of others. We reduce Laetz's total hours by 30%. We also further reduce his hours by 5% for duplication. These reductions are split between the hours claimed for 2012 and 2013.
B	Laetz requests a rate of \$165 per hour for work done by him in 2012. However, upon reviewing his provided credentials, he does not have the required justification to qualify as an expert on this matter. Laetz in his claim recognizes this. He states in Attachment 12 that he is not an engineer. He also did not participate in the voting on engineering matters. He states that he "forced an explanation and examination ... from an educated layman's perspective." The Commission thus finds it reasonable to grant Laetz a rate of \$130.00 per hour, the lowest possible starting rate for an expert in 2012. However, we designate Laetz as an advocate.
C	Reduction for travel to LADWP meeting, which is within 120 miles and is therefore not eligible for reimbursement.
D	The Commission does not reimburse gas at the IRS reimbursement rate. Laetz has not provided documentation for his gas receipts, and therefore such costs are denied.
E	Laetz claims excessive intervenor compensation claim hours, and the claim is therefore reduced.

PART IV: OPPOSITIONS AND COMMENTS

A. Opposition: Did any party oppose the Claim?	No
B. Comment Period: Was the 30-day comment period waived (<i>see</i> Rule 14.6(c)(6))?	No
C. Summary of comments on the Proposed Decision.	There were no comments on the Proposed Decision.

FINDINGS OF FACT

1. Hans Laetz has made a substantial contribution to D. 14-02-015.
2. The requested hourly rates for Hans Laetz, as adjusted herein, are comparable to market rates paid to experts and advocates having comparable training and experience and offering similar services.
3. The claimed costs and expenses are reasonable and commensurate with the work performed.
4. The total of reasonable compensation is \$40,618.58.
5. This rulemaking is a quasi-legislative proceeding with no named respondents. The proceeding broadly impacts electric and communications utilities.

CONCLUSION OF LAW

1. The claim, with any adjustment set forth above, satisfies all requirements of Pub. Util. Code §§ 1801-1812.
2. The claim should be paid from the Intervenor Compensation Fund.

ORDER

1. Hans Laetz is awarded \$40,618.58.
2. Within 30 days of the effective date of this decision, the Commission's Intervenor Compensation Fund shall pay Hans Laetz the total award. Payment of the award shall include compound interest at the rate earned on prime, three-month non-financial commercial paper as reported in Federal Reserve Statistical Release H.15, beginning June 2, 2014, the 75th day after the filing of Hans Laetz's request, and continuing until full payment is made.
3. The comment period for today's decision is not waived.
4. This decision is effective today.

Dated _____, at San Francisco, California.

APPENDIX**Compensation Decision Summary Information**

Compensation Decision:		Modifies Decision?	No
Contribution Decision(s):	D.14-02-015		
Proceeding(s):	R.08-11-005		
Author:	ALJ Kenney		
Payer(s):	Commission's Intervenor Compensation Fund		

Intervenor Information

Intervenor	Claim Date	Amount Requested	Amount Awarded	Multiplier?	Reason Change/Disallowance
Hans Laetz	07/17/14	\$80,099.25	\$40,618.58	N/A	Reduction for non-substantial contribution and reduced hourly rate.

Advocate Information

First Name	Last Name	Type	Intervenor	Hourly Fee Requested	Year Hourly Fee Requested	Hourly Fee Adopted
Hans	Laetz	Advocate	Hans Laetz	\$165	2012	\$130.00
Hans	Laetz	Advocate	Hans Laetz	\$165	2013	\$135.00
Hans	Laetz	Advocate	Hans Laetz	\$165	2014	\$140.00

(END OF APPENDIX)